BUTZEL LONG, a professional corporation 380 Madison Avenue, 22<sup>nd</sup> Floor New York, New York 10017 (212) 818-1110 Barry N. Seidel Eric B. Fisher Katie L. Cooperman

UNITED STATES BANKRUPTCY COURT

Attorneys for Reorganized Debtors

SOUTHERN DISTRICT OF NEW YORK		
In re DPH HOLDINGS CORP., et al.,	) ) ) )	Chapter 11  Case No. 05-44481 (RDD)  Jointly Administered
Reorganized Debtors.	)	

## REORGANIZED DEBTORS' SUPPLEMENTAL REPLY WITH RESPECT TO PROOF OF ADMINISTRATIVE EXPENSE CLAIM NUMBER 18556

(CON-WAY FREIGHT, INC.)

DPH Holdings Corp. and its affiliated reorganized debtors in the above-captioned cases (collectively, the "Reorganized Debtors"), hereby submit this Supplemental Reply With Respect To Proof Of Administrative Expense Claim Number 18556 (the "Supplemental Reply") filed by Con-Way Freight, Inc. (the "Claimant") and respectfully represent as follows:

- On March 29, 2011 the Reorganized Debtors filed the Reorganized Debtors'
   Statement Of Disputed Issues With Respect To Proof Of Administrative Expense Claim Number
   18556 (Con-Way Freight, Inc.) (Docket No. 21184) (the "Statement of Disputed Issues").
- 2. Because the Claimant has not filed a supplemental response, the Statement of Disputed Issues is uncontested and the Reorganized Debtors rely upon the Statement of Disputed Issues.

05-44481-rdd Doc 21240 Filed 04/28/11 Entered 04/28/11 15:20:20 Main Document

3. In the event that the Claimant files of Supplemental response or otherwise raises additional issues contesting the assertions in the Statement of Disputed Issues, the Reorganized Debtors reserve all of the their rights to (a) supplement this Supplemental Reply and (b) assert that the Claimant has not followed the claims objection procedures approved by this Court.

WHEREFORE the Reorganized Debtors respectfully request that this Court enter an order (a) disallowing and expunging proof of administrative expense claim number 18556 in its entirety and (b) granting the Reorganized Debtors such other and further relief as is just.

Dated: New York, New York April 28, 2011

BUTZEL LONG, a professional corporation

By: /s/\_Eric B. Fisher
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Eric B. Fisher
Katie L. Cooperman
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Attorneys for Reorganized Debtors

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In re			) C	hapter 11	
DPH HOLDIN	GS CORP., et	al.,	*	ase No. 05-44481 (RI bintly Administered	DD)
	Reorga	nized Debtors.	)		

## **CERTIFICATE OF SERVICE**

I hereby certify that on April 28, 2011, a true and correct copy of the Reorganized Debtors' Supplemental Reply With Respect To Proof Of Administrative Expense Claim Number 18556 (CON-WAY FREIGHT, INC.) was served by Fax to the following person at the following address:

David Edelberg, Esq. 155 Polifly Road Hackensack, New Jersey 07601 F: (201) 343-5181 Attorneys for Con-Way Freight, Inc.

Dated: Detroit, Michigan
April 28, 2011

Alexis L. Richards
Alexis L. Richards